



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



437084

REPLY TO THE ATTENTION OF:

25 JUN 2012

**MEMORANDUM**

**DATE:**

**SUBJECT:** Enforcement Action Memorandum – Determination of Threat to Public Health and or the Environment at the Lindsay Light II Site/455 North Park Drive Chicago, Cook County, Illinois (Site Spill ID # YT, OU 13)

**FROM:** Verneta Simon, On-Scene Coordinator *VS*  
Emergency Response Branch II – Removal Section 4

Eugene Jablonowski, Health Physicist  
Emergency Response Branch I – Field Services Section

**THRU:** Sam Borries, Acting, Chief *Sam Borries*  
Emergency Response Branch II

**TO:** Richard C. Karl, Director  
Superfund Division

**I. PURPOSE**

The purpose of this Enforcement Action Memorandum is to document the determination of an imminent and substantial threat to public health and the environment posed by the existence of thorium-contaminated soils at Lindsay Light II (“Lindsay Light”) Operable Unit 13 (“OU 13”), located at 455 North Park Drive in Chicago, Illinois (“Site”). The Site is approximately one acre and is located in an area of Chicago known as “Streeterville.” Beginning in 1993, Streeterville has been the location of several removal actions to remove radioactive thorium waste. To date, U.S. EPA has not initiated any response actions at this operable unit using the On-Scene Coordinator \$50,000/\$250,000 delegation and warrant authority.

## **II. SITE CONDITIONS AND BACKGROUND**

**CERCLIS # ILD 0000002212**

### **A. Site Description**

#### **1. Removal site evaluation**

On October 11-12, 2000, U.S. EPA conducted a radiological walkover of the property that was and currently is a parking lot, to determine whether there were any elevated gamma readings at the surface that might indicate the presence of subsurface radioactive materials. There were no highly elevated surface gamma radiation readings. Several areas, generally on the far south side of the parking lot, however, had surface gamma readings distinct from background gamma readings. In November 2002, samples were collected from test pits at the property. The highest sample result indicated 90 pico Curies per gram ("pCi/g") total radium, which exceeded the 7.1 pCi/g cleanup criterion established for Lindsay Light associated thorium contamination in the Streeterville neighborhood of Chicago, Illinois.

In 2000, OU 7, 319 East Illinois Street was a single parcel of property. In July 2007, the single parcel was legally divided into two separate parcels and both parcels were sold. The northern one-third of the property was purchased by the Hanover Company ("Hanover") and retained its designation as OU 7 HBE, 465 North Park Drive. In September 2007, Region V designated the southern two-thirds of the property as OU 13, with an address of 455 North Park Drive. On April 25, 2008, Hanover entered into an Administrative Settlement Agreement and Order on Consent ("ASAOC") with U.S. EPA. Hanover radiologically investigated OU 7, except areas with pre-existing structures (e.g. road ramp) which inhibited the subsurface investigation to native sand. On April 15, 2012, the new owner of OU 13, New Water Park LLC ("NWP"), executed an ASAOC with U.S. EPA.

New Water Park LLC ("NWP") is the present owner of the southern portion of the property now known as OU 13. NWP met with U.S. EPA on January 23, 2012 to discuss plans to construct a 54-story high-rise building. NWP began site preparation work in April 2012. The soil sample results from November 2002 identified thorium contamination at this Site. This Site is across the street from the initial Lindsay Light II site located at 316 East Illinois Street where the Lindsay Light Company refined monazite ore to produce thorium nitrate and manufacture thorium-impregnated gas mantles.

From 1996 to 2000, during the remediation of 316 East Illinois, over 30,000 cubic yards of thorium contaminated material were excavated and disposed of at a licensed radioactive disposal facility in Utah. Following the discovery of thorium contamination at the 316 East Illinois location, U.S. EPA has amassed nearly two decades of experience identifying thorium contamination and managing the excavation and disposal of thorium contaminated materials from multiple properties in the Streeterville area. In addition, after the Lindsay Light Company

moved its thorium manufacturing equipment from downtown Chicago to its Rare Earths Facility (“REF”) in City of West Chicago during the mid-1930s, releases of thorium wastes resulted in four National Priorities List (“NPL”) Sites known as the Kerr-McGee West Chicago Sites. The thorium wastes from the West Chicago REF contaminated a park, hundreds of homes, schools and businesses, a sewage treatment plant and a river and creek. Based on these experiences with thorium refining and manufacturing residuals, it is reasonable and prudent to expect that the removal of asphalt and subsequent construction activities will expose suspected subsurface radioactive contamination, thereby creating a potential release of a hazardous substance that may present an imminent and substantial endangerment to human health and the environment.

## **2. Physical location**

This one-acre Site is located at 455 North Park Drive, Chicago, in Cook County, Illinois (See Figure 1 on page 5). The geographical coordinates for the Site are Latitude 41.890058 North and Longitude 87.619078 West. Immediately surrounding this Site are several properties where U.S. EPA previously identified thorium contaminated soils above the 7.1 pCi/g clean-up level and required remediation. Figure 2, the City of Chicago Streeterville Thorium Map, identifies the properties that have been evaluated and/or remediated since 1993.

U.S. EPA performed an Environmental Justice (“EJ”) analysis that is contained in Attachment 1. The area surrounding the Lindsay Light II Site/OU 13 455 Park Drive was screened using Region V’s EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (“EJSEAT”)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region V. The Lindsay Light II Site is in a census tract with a score of 3 (Attachment 1). Upon closer analysis, within one mile of the Site, the demographics are as follows: the population is 23.5% minority and 8% of the population is living below the poverty level. Therefore, Region 5 does not consider the site to be high-priority potential EJ area of concern.

## **3. Site Characteristics**

This property was most recently used as a commercial parking lot.

## **4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant**

The radiological survey conducted by STS Consultants in 2002, the predecessor to AECOM, NWP’s current environmental consultant, demonstrated that several areas, generally on the far south side of the parking lot, had surface gamma readings distinct from background. In November 2002, samples were collected from test pits. The highest sample result indicated 90 pCi/g total radium, which exceeded the 7.1 pCi/g cleanup criterion for the Streeterville neighborhood. Copies of pertinent surveys, e-mail messages and analytical reports are contained in the Administrative Record (Attachment 2).

## **5. NPL status**

This site is not on the NPL.

### **B. Other Actions to Date**

#### **1. Previous actions**

U.S. EPA has been assessing and overseeing the clean up of Lindsay Light-related thorium contamination in the Streeterville area of Chicago since 1993. In 1996, U.S. EPA issued a Unilateral Administrative Order ("1996 UAO") to Kerr-McGee Chemical LLC, the successor corporation to the Lindsay Light Company, and to the owner and developer of 316 East Illinois Street. In 2000, U.S. EPA amended the UAO to include the property directly west of that site. Since 2000, with U.S. EPA's direction and oversight and generally pursuant to consensual orders, property owners and developers have investigated and cleaned up more than ten thorium-contaminated properties associated with Lindsay Light contamination in Streeterville. The action memoranda and respective administrative records for these actions are incorporated by reference into this decision document as set forth in the administrative record (Attachment 2).

#### **2. Current actions**

Because the 2002 STS investigation indicated a sample result of 90 pCi/g, prior to undertaking construction at 455 North Park Drive, NWP has agreed in an ASAOC dated April 15, 2012, to investigate and dispose of any thorium-contaminated soils identified at the Site.

### **C. State and Local Authorities' Roles**

#### **1. State and local actions to date**

In 1999, the City of Chicago through the Department of Environment<sup>1</sup> established Right-of-Way permit procedures to ensure radiological screening before and during work exposing or intruding into subsurface soils in Streeterville rights-of-ways. A description of the procedures and a map<sup>2</sup> of the Streeterville Thorium Investigation are all available on the City of Chicago's website. The map is available on the next page of this Memorandum and titled Figure 2.

The State of Illinois' role is described below in the following paragraph C.2 below.

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<sup>1</sup> Please note on January 1, 2012, the City of Chicago abolished their Department of Environment and personnel is now scattered throughout their organization.

<sup>2</sup> Please note the map of the Streeterville Thorium Investigation Area is dated June 15, 2010. Since that date, known contamination has been removed from 211 East Grand and thorium contamination has been identified at 515 North Peshtigo.



Figure 1 - 455 N. Park Drive (outlined in red)

## Streeterville Thorium Investigation

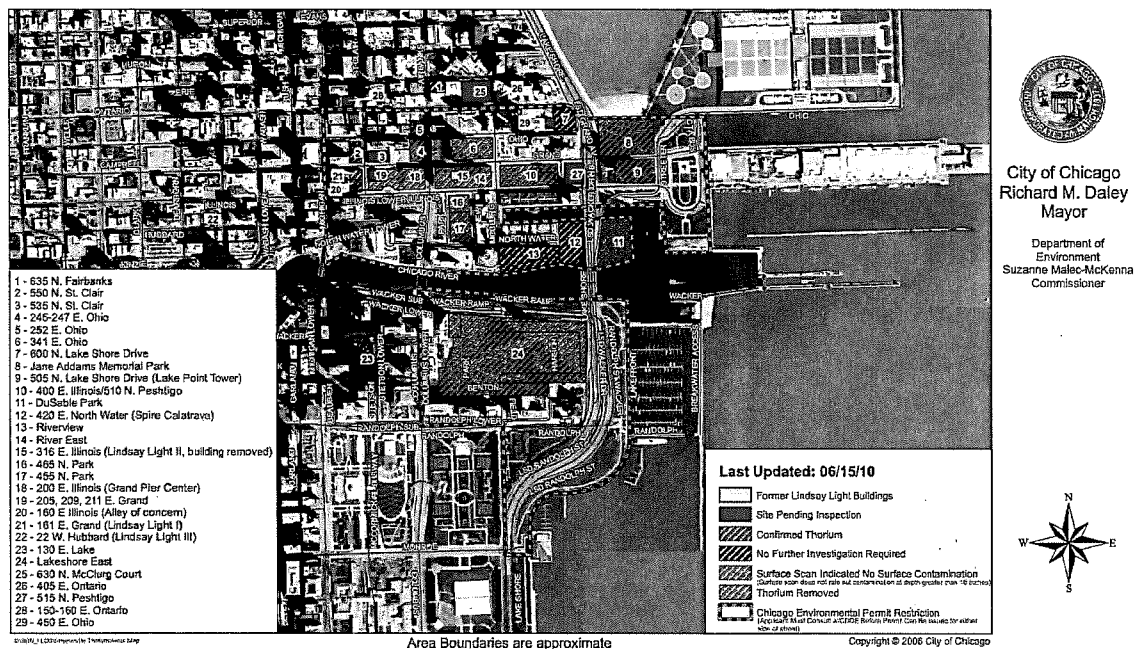


Figure 2 - Streeterville Thorium Investigation

## **2. Potential for continued State/Local response**

Beginning in 1993, U.S. EPA has directed CERCLA response activities for Lindsay Light-related thorium contamination in Streeterville. In 1993, the Illinois Department of Nuclear Safety (now known as the Illinois Emergency Management Agency, Division of Nuclear Safety ("IEMA")) participated in a joint building survey with U.S. EPA and ATSDR. IEMA has had very limited involvement with the Lindsay Light removal sites because the Lindsay Light facility in downtown Chicago did not hold an Atomic Energy Commission, Nuclear Regulatory Commission ("NRC") or Illinois Agreement State authority conferred by the NRC. In contrast, IEMA has been and is currently involved with the Kerr-McGee West Chicago NPL sites associated with the REF. The REF was a federally licensed radioactive materials facility and is currently licensed by IEMA, under Agreement State authority. Due to limited resources, it appears unlikely the State will now choose to become involved in the unlicensed Lindsay Light response and enforcement activities.

The U.S. EPA has been working to develop the City of Chicago's expertise by awarding a cooperative agreement to the City of Chicago to address the contamination in the Streeterville Right-of-Ways. In 2011, the U.S. EPA awarded a cooperative agreement to the Chicago Park District for the future DuSable Park in Streeterville. These cooperative agreements are funded by a bankruptcy settlement with Tronox LLC, a former subsidiary of Kerr-McGee and successor to the Lindsay Light Company.

## **III. THREAT TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Conditions at the Site may pose an imminent and substantial endangerment to public health or welfare or the environment, based upon factors set forth in the National Contingency Plan ("NCP"), 40 Code of Federal Regulations ("CFR") Section 300.415 (b)(2). These conditions include:

**Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

Given U.S. EPA's extensive experience in Streeterville, the proximity of this site to other Lindsay Light thorium contaminated properties, and soil sample and gamma testing results, it has been demonstrated that thorium-contaminated soils related to the Lindsay Light Company are present at this Site. Given NWP's plan to excavate soils to construct a high-rise on this Site, a potential exposure threat exists to construction and utility workers and the public.

**High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;**

Given the elevated gamma measurements detected in 2002 and the analytical soil result of 90 pCi/g, if proper measures to identify and control radiological contamination are not implemented, thorium contaminated wastes may be released during construction work.

**Other situations or factors that may pose threats to public health or welfare or the environment;**

Beginning in approximately 1904, the Lindsay Light Company manufactured gas lights and gas mantles for residential and commercial use, at several locations in the Streeterville neighborhood of Chicago. The historic record regarding the Lindsay Light Company's volume of thorium production in Streeterville is uncertain. According to a U.S. Tariff Commission document on the Incandescent Gas-Mantle Industry published in 1920, in 1914 Lindsay expanded its thorium manufacturing capacity in Chicago to meet the increased domestic and foreign demand caused by the outbreak of war in Europe.

The production of thorium for the gas light mantles resulted in a sandy waste known as mill tailings that was often used as fill material. Minutes of the November 1935 Lindsay Board of Directors' Meeting discussed plans to move Lindsay's Streeterville operations to the City of West Chicago by September 1936. As previously explained, the West Chicago facility became known as the REF and was eventually licensed by the Nuclear Regulatory Commission and later, by IEMA. In West Chicago, Lindsay and its successors continued to produce thorium as well as other radioactive materials for commercial and defense-related purposes. As a result of Lindsay's REF, thorium manufacturing and disposal activities, four West Chicago areas were listed on the National Priorities List of Superfund Sites.

In the West Chicago area, EPA, with IEMA's assistance, has overseen the clean up of over 670 homes, schools, and businesses, a 100-acre public park, a sewage treatment plant, and more than six miles of creek and river in DuPage County. The widespread use and dispersal of the thorium material as fill in West Chicago likely reflects a similar widespread dispersal of the Lindsay Light thorium residuals in Chicago. Unlike the relatively open areas in the City of West Chicago, where the extent of the thorium contamination was easier to detect by the gamma surface expression, most of the Lindsay Light thorium in Streeterville was shielded from detection by asphalt, sidewalks, streets, and buildings. Consequently, during construction activities in Streeterville, appropriate response actions are necessary to assure that excavation or other invasive work will not result in the uncontrolled exposure to or release of thorium contamination or improper disposal of the thorium-contaminated soils at or from the Site.

**The availability of other appropriate federal or state response mechanisms to respond to the release;**

As described in Section II and the Administrative Record, to date U.S. EPA has taken the lead in investigating and directing the cleanup of Lindsay Light-related thorium contamination in Streeterville. Private PRPs, such as NWP, have routinely entered into ASAOs with U.S. EPA and, pursuant to the ASAOs, those private PRPs have funded the cleanups and paid U.S. EPA's response costs. There are no other appropriate federal or state response mechanisms to respond to the release.

#### **IV. ENDANGERMENT DETERMINATION**

Given the Site conditions, the nature of the contaminants, radioactive materials that cause external exposure, inhalation, ingestion, and direct contact hazards, as described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

#### **V. PROPOSED ACTIONS AND ESTIMATED COSTS**

##### **A. Proposed Actions**

##### **1. Proposed Action Description:**

PRP activities at this Site will include, but are not limited to, investigation, excavation and proper disposal of contaminated soils while constructing a 56-story building.

##### **2. Contribution to Remedial Performance:**

The proposed action will not impede future responses based upon available information.

##### **3. Applicable or Relevant and Appropriate Requirements (ARARs)**

All applicable or relevant and appropriate requirements (ARARs) will be complied with to the extent practicable. The primary federal Applicable or Relevant and Appropriate Regulation for radioactive soil cleanup criteria is Title 40, Part 192 of the Code of Federal Regulations, "Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings." Ancillary ARARs include the NRC's Title 10, Part 20, of the Code of Federal Regulations, "Standards for Protection Against Radiation," NRC Regulatory Guide 1.86, "Termination of Operating License for Nuclear Reactors," and the Department of Transportation's Title 49 for shipping hazardous materials. Relevant EPA guidance includes OSWER Directive No. 9200.4-25, issued February 12, 1998, regarding the "Use of Soil Cleanup Criteria in 40 CFR Part 192, as Remediation Goals for CERCLA Site."



Many of the regulations carried out by the NRC have been delegated to IEMA. The State has previously identified the regulations at 32 Ill. Administrative Code 332, Licensing Requirements for Source Material Milling Facilities which contain the licensing requirements for source material milling facilities in Illinois as relevant and appropriate to the cleanup of thorium in Streeterville. The cleanup standard for soils and sediment at the Site derived from the foregoing federal and state regulations is 7.1 pCi/g combined radium.

U.S. EPA will also implement the principle of ALARA ("As Low As Reasonably Achievable"), which refers to the cleanup of all materials above the cleanup standard, to the extent practicable. ALARA is described in DOE and NRC orders and regulations and in U.S. EPA regulations at 40 CFR § 192.22. U.S. EPA made the decision to achieve ALARA in an attempt to maximize protection of human health.

#### **4. Project Schedule:**

Not applicable.

#### **B. Estimated Costs:**

Not available, because this is an Enforcement Action Memorandum. The PRP has agreed to pay response costs including U.S. EPA response costs.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

#### **VI. CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

Delayed or non-action may result in increased likelihood of external exposure, inhalation, ingestion or direct contact to human populations accessing and working on the site. Also, since there is no threshold for radiological risk, additional exposure to radiological materials will increase the cancer risk.

#### **VII. OUTSTANDING POLICY ISSUES**

None.

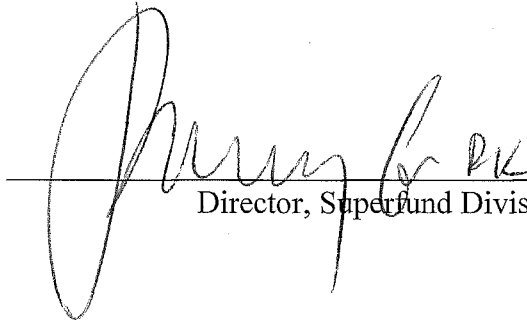
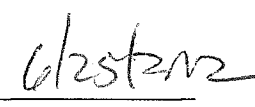
#### **VIII. ENFORCEMENT**

For Administrative purposes, information concerning confidential enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

## **IX. RECOMMENDATION**

This decision document represents the selected removal action for the Lindsay Light II Site/455 North Park Drive, Chicago, Illinois, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for this Site (Attachment 2). Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed removal action. You may indicate your decision by signing below.

APPROVE:

   
\_\_\_\_\_  
Director, Superfund Division                      Date

DISAPPROVE:

\_\_\_\_\_  
Director, Superfund Division                      Date

Enforcement Confidential Addendum

### Attachments

- 1 Environmental Justice Map
2. Index to the Administrative Record

cc: S. Fielding, U.S. EPA, 5203-G  
V. Darby, U.S. Department of Interior, w/o Enf. Addendum  
J. Kim, Illinois Environmental Protection Agency, w/o Enf. Addendum  
T. Rettig, Illinois Department of Natural Resources, w/o Enf. Addendum  
B. Everetts, Illinois Environmental Protection Agency, w/o Enf. Addendum  
J. Johnson, Illinois Emergency Management Agency, w/o Enf. Addendum  
T. Runyon, Illinois Emergency Management Agency, w/o Enf. Addendum  
B. Haller, Chicago Department of Planning and Development, w/o Enf. Addendum  
M. Ames, Chicago Department of Law, w/o Enf. Addendum

BCC PAGE

(REDACTED 1 PAGE)

ENFORCEMENT ADDENDUM

LINDSAY LIGHT II SITE  
OPERABLE UNIT 13/455 NORTH PARK AVENUE  
CHICAGO, COOK COUNTY, ILLINOIS

JUNE 2012

ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

(REDACTED 3 PAGES)

ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY

## ATTACHMENT 1

### R5 Superfund EJ Analysis for the Lindsay Light II Site / OU 13

The area surrounding the Lindsay Light II Site/OU 13 was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region 5. The Lindsay Light II Site / OU 13 is in a census tract with a score of 3 (Figure 1).

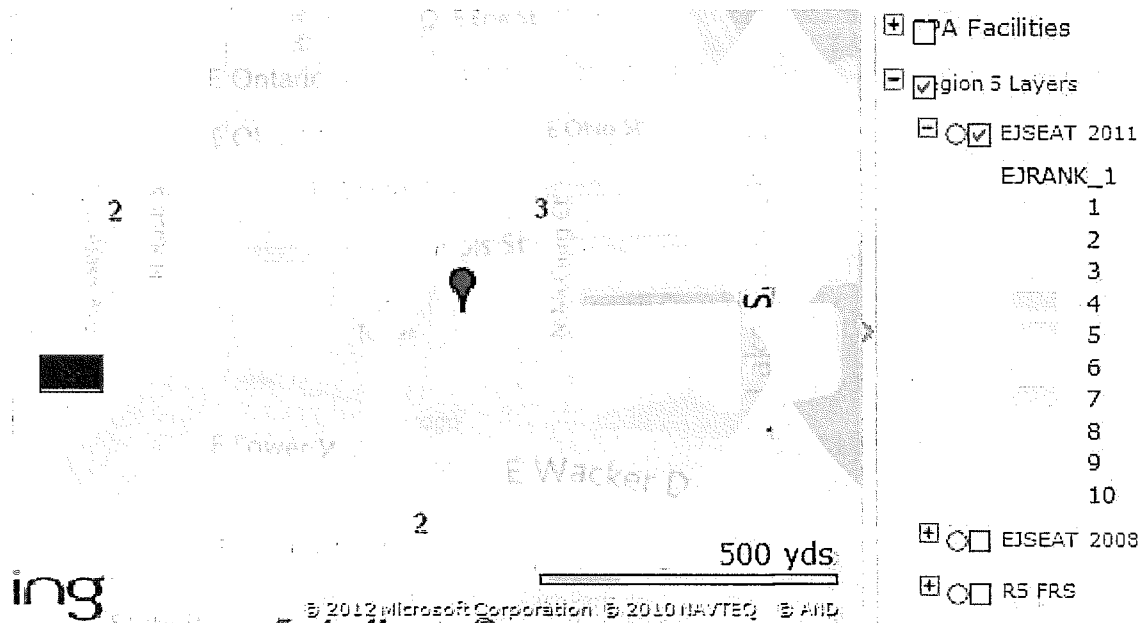


Figure 3 - Lindsay Light II Site / OU 13 Map Showing EJ SEAT Values for Surrounding Area

Upon closer analysis, within 1 mile of the Site, the demographics are as follows: the population is 23.5 % minority and 8% of the population is living below the poverty level. As shown in Table 1 these numbers are below the County and State percentages. Therefore, Region 5 does not consider the Site to be a high-priority potential EJ area of concern.

Table 1

Census 2000 data for the Study Area, Cook County, and State

	Study Area	Cook County, IL	IL
Percent Minority:	23.5%	52.4%	32.2%
Persons Below Poverty Level:	3468 (8%)	713040 (13.5%)	1291958 (10.7%)

DISCLAIMER: The values obtained from the EJSEAT tool are to be used for screening level analyses and should not be considered a definitive metric. The EJSEAT tool is under development and review; therefore the values obtained from the tool should be considered interim.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL ACTION

ADMINISTRATIVE RECORD  
FOR  
LINDSAY LIGHT II SITE  
OPERABLE UNIT #13: 455 NORTH PARK DRIVE  
CHICAGO, COOK COUNTY, ILLINOIS

ORIGINAL  
MAY 31, 2012

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	4/12/94	Berggreen, R. & Dinardo, R., STS Consultants	Black, D., Chicago Music & Dance Theater	Phase I Environmental Assessment for Chicago Music and Dance Theater Site (SDMS ID: 226482)	82
2	6/22/94	Berggreen, R., STS Consultants	File	Draft Phase I Environ- mental Assessment of Proposed Chicago Music and Dance Theater Site (SDMS ID: 225804)	81
3	7/21/94	Bugg, R., E & E Inc	Simon, V., U.S. EPA	Memo re: Comments on the STS Draft Phase I Environ- mental Assessment of 319 E. Illinois Street (SDMS ID: 226896)	3
4	12/20/94	Newlin, S., STS Consultants	Simon, V., U.S. EPA	FAX Transmission re: Certification for the Waste Water at Lindsay Light II Site w/ Att- ached IDNS Correspondence (SDMS ID: 405509)	4
5	08/25/95	Thompson, R., Kerr-McGee Chemical Corporation	Klinger, J., IDNS	Letter re: Classification of Radioactive Material at Lindsay Light II w/ Att- ached Lindsay Light Company Meeting Minutes (194-1931) and Letter to Stockholders (SDMS ID: 405510)	20
6	10/25/95	Klinger, J., IDNS	Thompson, R., Kerr-McGee Chemical Corporation	Letter re: Classification of Radioactive Material at Lindsay Light II (SDMS ID: 405508)	1
7	06/04/96	Allen, R., IDNS	Simon, V., U.S. EPA	Letter re: Identification of ARARs for the Lindsay Light II Site w/ Attached Action Criteria for Super- fund Removal Actions at Kerr-McGee Residential Areas Site and Cover Letter (SDMS ID: 405507)	21

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
8	09/12/00	Koester, R., HBE Corporation	Simon, V., U.S. EPA	Letter re: Walkover Survey of the Parking Lot at 319 E. Illinois Street w/Attached Consent for Access to Property Form (SDMS ID: 226481)	2
9	12/01/00	Simon, V., U.S. EPA	Miller, R., HBE Corporation	Letter re: Walkover Survey of the Parking Lot at 319 E. Illinois Street (SDMS ID: 226489)	3
10	04/02/01	Miller, R., HBE Corporation	Simon, V., U.S. EPA	Letter re: Property Ac- quisition at 319 E. Illinois Street (SDMS ID: 226480)	1
11	07/25/02	English, B., The English Company	Pullman Bank & Trust Company	Limited Subsurface Investigation for 319 E. Illinois Street (SDMS ID: 226487)	38
12	11/20/02	HBE Corporation	File	Outline Specification for the Thorium and Lead In- vestigation Work Plan at 319 E. Illinois Street (SDMS ID: 226483)	8
13	12/20/02	Torres, S. & R. Berggreen STS Consultants, LTD	Paulauskis, J., HBE Corporation	Letter re: Report of Soil Sampling and Radiological Analysis at Adams Mark Site, SW Corner of Illinois and New Sts. w/ Cover Letter (SDMS ID: 226491)	8
14	03/10/03	Simon, V., U.S. EPA	Paulauskis, J., HBE Corporation	Letter re: Transmittal of Ogden Slip Report (SDMS ID: 226490)	2
15	06/17/03	Karl, R., U.S. EPA	PRP List	Letter re: General Notice of Potential Liability for OU7/HBE Corporation at the Lindsay Light II Site (SDMS ID: 226478)	7
16	07/03/03	Paulauskis, J., HBE Corporation	Regel, D., U.S. EPA	Letter re: HBE Response to U.S. EPA General Notice Letter for Operable Unit 7 at the Lindsay Light II Site (SDMS ID: 226479)	1
17	00/00/06	City of Chicago/ Department of Environment	File	Map: Streeterville Thorium Investigation (SDMS ID: 405511)	1

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
18	04/25/08	Karl, R., U.S. EPA	Respondents	Administrative Settlement Agreement and Order on Consent for Removal Docket No. V-W-08-C-899 (SDMS ID: 291077)	38
19	1994-2012	U.S. EPA	Public	Administrative Record for Lindsay Light II (Original and Updates #1-11) and Operable Unit #18 Original AR (DOCUMENTS CONTAINED ON THE INDEX ARE INCORPORATED BY REFERENCE INTO THE ADMINISTRATIVE RECORD FOR OPERABLE UNIT #13) (SDMS ID: 405516)	17
20	00/00/00	Simon, V. & E. Jablonowski, U.S. EPA	Karl, R., U.S. EPA	Enforcement Action Memorandum: Determination of Threat to Public Health and or the Environment at the Lindsay Light II Site - 455 North Park Drive (PENDING)	